

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION

This document relates to:

*County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al.*

Case No. 1:18-OP-45090

*The County of Cuyahoga v. Purdue Pharma  
L.P., et al.*

Case No. 17-OP-45004

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**NOTICE OF SERVICE OF MANUFACTURER DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT  
FOR PLAINTIFFS' FAILURE TO OFFER PROOF OF CAUSATION**

Pursuant to the Directions Regarding Filing of Briefs Under Seal, ECF No. 1719, Manufacturer Defendants (as defined in Manufacturer Defendants' Motion For Summary Judgment For Plaintiffs' Failure To Offer Proof Of Causation) hereby provide notice that on June 28, 2019, they served unredacted copies of the following documents on all Parties, the Court, and the Special Masters:

- Manufacturer Defendants' Motion For Summary Judgment For Plaintiffs' Failure To Offer Proof Of Causation;
- Memorandum In Support Of Manufacturer Defendants' Motion For Summary Judgment For Plaintiffs' Failure To Offer Proof Of Causation;
- Declaration of Timothy W. Knapp in Support of Manufacturer Defendants' Motion For Summary Judgment For Plaintiffs' Failure To Offer Proof Of Causation, along with Exhibits 1 to 15
- [Proposed] Order Granting Manufacturer Defendants' Motion For Summary Judgment For Plaintiffs' Failure To Offer Proof Of Causation;

- Summary Sheet for Manufacturer Defendants' Motion For Summary Judgment For Plaintiffs' Failure To Offer Proof Of Causation (also attached hereto as Exhibit A).

Dated: June 28, 2019

Respectfully submitted,

/s/ Mark S. Cheffo

Mark S. Cheffo  
DECHERT LLP  
Three Bryant Park  
1095 Avenue of the Americas  
New York, NY 10036  
Tel: (212) 698-3500  
Mark.Cheffo@dechert.com

*Counsel for Defendants Purdue Pharma L.P.,  
Purdue Pharma Inc., and The Purdue Frederick  
Company*

*Co-Liaison Counsel for the Manufacturer  
Defendants<sup>1</sup>*

/s/ Carole S. Rendon

Carole S. Rendon  
BAKER & HOSTETLER LLP  
Key Tower 127 Public Square, Suite 2000  
Cleveland, OH 44114-1214  
Telephone: (216) 621- 0200  
Fax: (216) 696-0740  
[crendon@bakerlaw.com](mailto:crendon@bakerlaw.com)

*Counsel for Defendants Endo Health Solutions Inc.  
and Endo Pharmaceuticals Inc.; Par  
Pharmaceutical, Inc., and Par Pharmaceutical  
Companies, Inc.*

*Co-Liaison Counsel for the Manufacturer Defendants*

---

<sup>1</sup> Teva Pharmaceutical Industries Ltd., Allergan plc f/k/a Actavis plc, and Mallinckrodt plc are respectively an Israeli corporation, Irish holding company, and Irish company that are not subject to and contest personal jurisdiction for the reasons explained in their pending motions to dismiss for lack of personal jurisdiction; they are specially appearing to join this motion as a result of the Court's deadline to file dispositive and Daubert motions, and, thus, they do not waive and expressly preserve their pending personal jurisdiction challenges.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28th day of June 2019, the foregoing was served upon all counsel of record via email.

*/s/ Donna M. Welch*  
Donna M. Welch, P.C.  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654  
Tel: (312) 862-2000  
donna.welch@kirkland.com